



State of Utah

**Department of
Natural Resources**

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September 20, 2006

Director (630)
Bureau of Land Management
Administrative Record, Room 401 LS
Eastern States Office
7450 Boston Boulevard
Springfield, Virginia 22153

Subject: RIN 1004-AD90; Comment on Commercial Oil Shale Leasing Program

The Utah Minerals Regulatory Program of the Division of Oil, Gas and Mining (OGM) regulates the extraction of oil shale and bituminous sands under the Utah Mined Land Reclamation Act (UCA 40-8-1). Rules are already in place for the regulation of mining operations that ensure public health and safety; minimize present and future on and off site environmental degradation; and reclamation financial guarantees to return the land to a stable ecological condition compatible with the land use. The BLM should keep in mind when writing the rules for the management of mining operations the following comments.

- Any additional rules should minimize the need for operators to undertake duplicating, overlapping, or conflicting requirements.
- OGM successfully administers and is the regulatory authority for surface coal mining operations on federal and non-federal lands through a cooperative agreement with the Office of Surface Mining. The BLM should consider a similar program that allows for state primacy in the regulation of oil shale and tar sands operations.

Thank you for the opportunity to comment and we look forward to continued cooperation with the BLM in managing the resources within the State of Utah.

Sincerely,


Mary Ann Wright
Associate Director, Mining

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